

IN THE Circuit COURT OF THE First JUDICIAL DISTRICT  
OF HINDS, COUNTY, MISSISSIPPI

Shrossia Horton

PLAINTIFF

VS.

NO. 14-675

DEFENDANT

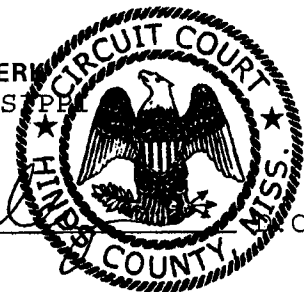
Hinds County, Mississippi et al

I, BARBARA DUNN, CIRCUIT CLERK, OF THE CIRCUIT COURT  
IN AND FOR THE SAID STATE AND COUNTY DO HEREBY CERTIFY THAT  
THE ATTACHED ARE TRUE AND CORRECT COPIES OF ALL THE PAPERS  
FILED IN THIS OFFICE IN THE ABOVE STYLED AND NUMBERED CAUSE,  
AS OF THIS DATE THE SAME IS OF RECORD IN THIS OFFICE IN DOCKET  
BOOK NO. 14 PAGE NO. 675 TO WIT: entire file

GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS THE 9  
DAY OF Dec., 2014.

BARBARA DUNN, CIRCUIT CLERK  
HINDS COUNTY, MISSISSIPPI

BY Shal



**FILED**

Case: 3:14-cv-00675-TTG Document #: 2 Filed: 10/29/2014 Page 1 of 10

OCT 29 2014

BARBARA DUNN, CIRCUIT CLERK

BY

D.C.

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:**

14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

---

**COMPLAINT  
JURY TRIAL DEMANDED**

---

COMES NOW Plaintiff, Throssia Horton, and brings this action against Defendants, Hinds County, Mississippi, Hinds County Sherriff's Department, and Hinds County Board of Supervisors, and John Does 1 through 10. Plaintiff is seeking compensatory damages, punitive damages, costs and attorney fees, and other such relief as allowed under the relevant statutes. As more specifically set forth below, Plaintiff has been subjected to retaliation, any and all other Equal Employment Opportunity ("EEO") violations and breach of contract by the Defendant. The actions of the Defendant described herein constitute violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. 1981 and Mississippi law.

---

**PARTIES**

---

1. Plaintiff, Throssia Horton, in an adult resident citizen of Jackson, Tennessee.

2. Defendant, Hinds County, Mississippi, may be served with process through Eddie Jean Carr, Chancery Clerk and Clerk of the Hinds County Board of Supervisors, 316 South President Street, Jackson, Mississippi.
3. Defendant, Hinds County Sheriff's Department (hereinafter "Sheriff's Department") is a political subdivision of Hinds County, Mississippi. As a political subdivision of Hinds County, Mississippi, the Sheriff's Department may be served with process through Eddie Jean Carr, Chancery Clerk and Clerk of the Hinds County Board of Supervisors, 316 South President Street, Jackson, Mississippi.
4. Defendant, Hinds County Board of Supervisors (hereinafter "The Board") is a political subdivision of Hinds County, Mississippi. As a political subdivision of Hinds County, Mississippi, The Board may be served with process through Eddie Jean Carr, Chancery Clerk and Clerk of the Hinds County Board of Supervisors, 316 South President Street, Jackson, Mississippi.
5. Defendants, John Does 1 through 5 are Individuals whom Plaintiff is currently unable to identify despite diligent efforts. Said Defendants are named pursuant to Miss. R. Civ. P. 9(h), insofar as their acts and/or omissions were negligent and/or otherwise tortious.

---

**JURISDICTION**

---

6. The Court has personal jurisdiction under 28 U.S.C. § 1331, and civil

rights jurisdiction under 28 U.S.C. § 1343. This action is authorized and instituted for causes of action arising under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000(e) et seq., 42 U.S.C. § 1981, and Mississippi law.

7. This Court has subject matter jurisdiction over the Plaintiff's claims of retaliation and any all other EEO violations and for breach of contract under Mississippi law.
8. Venue is proper in this Court.

---

**STATEMENT OF FACTS**

---

9. Plaintiff has been an employee of the Defendants since June of 2007 as a jailor.
10. On or about April 2012, Plaintiff was transferred from a jailor to a patrol deputy for the Defendants.
11. Her job duties includes but not limited to driving a patrol car in and around Hinds County, Mississippi, enforcing the peace and dignity of the laws in Hinds County, Mississippi.
12. On or about July 2012, Plaintiff suffered an on the job work injury in which required surgery to her knee in February 2013.
13. On or about April 2013, while still on light duty, Plaintiff was made to participate in a weapons qualification. Plaintiff could not kneel at the time due to her knee injury.

14. Plaintiff failed her weapons qualification.
15. Upon release of her light duty, Plaintiff was denied the right to another weapons qualification.
16. On or about August 12, 2013, Plaintiff was sent home and her patrol car taken.
17. Plaintiff was reassigned to the front desk of the downtown jail in Jackson, Mississippi.
18. On or about October 29, 2013, Plaintiff was transferred back to jailor without explanation.
19. Plaintiff suffered a loss of pay.
20. Prior to these above events, Plaintiff had previously filed a complaint for discrimination in federal court for violations of her civil rights in March of 2013; however, Defendants did not answer to deny until October 2013. This is the same month that Plaintiff was transferred to jailor.
21. Plaintiff knew of other employees that failed the weapon's qualifications that were not transferred to jailor and continued with their present assignment.
22. The only reason for the reassignment was retaliation for her filing of her civil rights complaint.
23. In January of 2014, Plaintiff had a meeting with Chief Deputy Chris Picou to discuss the demotion to jailor. Picou specially made reference

to her prior filed lawsuit which was not the subject of her transfer.

Based on his comments, Plaintiff gained a greater belief that her transfer was due to her prior filed lawsuit.

24. The unlawful employment practices complained of above were intentional.
25. The unlawful employment practices complained of above were done with malice or with reckless indifference to the federally-protected and state-protected rights of Plaintiff.
26. A copy of the Notice of Right to Sue in the instant case attached as Exhibit "A".

---

**COUNT I**

**RETALIATION**

---

27. Plaintiff, Throssia Horton, re-alleges and incorporates all averments set forth in Paragraphs 1 through 26 above as if fully incorporated herein.
28. Defendants have unlawfully retaliated against Plaintiff for opposing discriminating practices by Defendants, thereby engaging Plaintiff in protected activity under Title VII of the Civil Rights Act of 1964 and 42 U.S.C. § 1981.
29. Defendants' unlawful retaliation against Plaintiff has damaged her professional reputation among her peers.
30. As a direct and proximate result of Defendants' unlawful conduct toward Plaintiff, Plaintiff has lost wages and benefits and has sustained

Case: 25CI1:14-cv-00675-TTG Document #: 2 Filed: 10/29/2014 Page 6 of 10

other pecuniary loss. Plaintiff has also been denied opportunities for career advancement. Defendants' retaliatory practices, insults, contempt, and disdain have been demeaning to Plaintiff and have caused her to suffer deep pain, humiliation, anxiety, health issues, and emotional stress.

---

**COUNT II**

**INTENTIONAL AND/OR NEGLIGENT  
INFLICTION OF EMOTIONAL DISTRESS**

- 
31. Plaintiff re-alleges and incorporates all averments set forth in paragraphs 1 through 30 above as if fully incorporated herein.
  32. The effect of these actions on Plaintiff was reasonably foreseeable.
  33. Plaintiff has suffered injury as a result of the Defendants' actions.

---

**COUNT III**

**BREACH OF CONTRACT**

- 
34. Plaintiff re-alleges and incorporates all averments set forth in paragraphs 1 through 33 above as if fully incorporated herein.
  35. Along, with Plaintiff reporting of a federal employment rights violations, while Plaintiff was only transferred, Defendants breached their contract with Plaintiff by cutting her pay. Therefore, Defendants' rate of pay for Plaintiff was wrongful in that it violated the public policy of the State of Mississippi.

36. Defendants represented to Plaintiff, by various means, including but not limited to, written and oral employee guidelines that all employees, including the Plaintiff would be treated fairly and equitably. These provisions and representations form a part of the Plaintiff's express or implied employment contract or agreement with Defendants.
37. Plaintiff reasonably relied on Defendants' express or Implied promises of job security and fair treatment and gave due consideration to such promises by rendering long and valuable service to the Defendants.
38. Plaintiff performed all conditions, covenants, promises, duties and responsibilities required of her in accordance and in conformity with the employment agreement or contract.
39. Defendants' termination of the Plaintiff, without good cause and in violation of public policy, constituted a breach of her express and/or implied employment contract. The breach of contract involved malice sufficient to create a tortious breach of contract as defined by Mississippi law.
40. There was implied in the agreement a covenant of good faith and fair dealing in the employment relationship between Defendants and Plaintiff. Such a duty required Defendants to refrain from any act that would prevent or impede the Plaintiff from performing all of the conditions of her employment.

Case: 25CI1:14-cv-00675-TTG Document #: 2 Filed: 10/29/2014 Page 8 of 10

41. Defendants breached the duty of good faith and fair dealing owed to their employees, especially the Plaintiff, herein, by decreasing her rate of pay for reports of their violations as required by law.

---

**COUNT IV**

**PUNITIVE DAMAGES**

---

42. Plaintiff re-alleges and incorporates all averments set forth in paragraphs 1 through 41 above as if fully incorporated herein.
43. The acts and omissions of Defendants described herein were willful, deliberate, and done with callous disregard for the rights of, sensibilities of, and likelihood of harm to Plaintiff.
44. Plaintiff is entitled to punitive damages as a result of Defendants' intentional acts in violation of Plaintiff's federally and state protected rights. Alternatively, Plaintiff is entitled to punitive damages because Defendants' unlawful acts against Plaintiff were committed maliciously and/or in reckless disregard of Plaintiff's rights.

---

**PRAYER FOR RELIEF**

---

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF RESPECTFULLY PRAYS that the Court causes service to issue in this cause upon the Defendants and that this matter be set for trial. Upon trial by jury thereon, Plaintiff prays that the following relief be granted:

1. Defendants make Plaintiff whole by providing compensation for past and future nonpecuniary losses resulting from unlawful practices complained above, including, but not limited to, emotional pain, suffering, inconvenience, loss of enjoyment of life, humiliation, and to her non-pecuniary losses in amounts to be determined at trial;
2. Punitive damages against Defendants in an amount to be determined by the jury;
3. All costs, disbursements, pre-judgment interest, post-judgment interest, expert witness fees and reasonable attorney's fees allowed under actions brought pursuant to Title VII, 42 U.S.C. § 1981 and Mississippi law;
4. Such further relief as is deemed just and proper.

THIS the 29th day of October, 2014.

Respectfully submitted,

Throssia Horton, Plaintiff

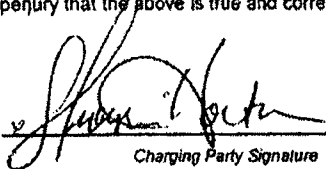
BY:

  
Daniel D. Ware, Her Attorney

**Ware Law Firm, PLLC**  
Daniel D. Ware, MSB# 10,847  
2609 US Highway 49 South  
Florence, MS 39073  
Phone: (601) 845-9273  
Fax: (601) 845-0749  
dware@warelawfirm.com

EEOC Form 5 (11/09)

Case: 25CI1:14 cv 00675 TTG Document #: 2 Filed: 10/29/2014 Page 10 of 10

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC		Agency(ies) Charge No(s): <b>423-2014-00446</b>
State or local Agency, if any _____ and EEOC				
Name (indicate Mr., Ms., Mrs.) <b>Ms. Throssia Horton</b>		Home Phone (incl. Area Code) <b>(601) 866-7518</b>		Date of Birth <b>01-20-1974</b>
Street Address <b>3129 South Norrell Road, Bolton, MS 39041</b>		City, State and ZIP Code <b>01-30-74</b>		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)				
Name <b>HINDS COUNTY SHERIFF'S DEPARTMENT</b>		No. Employees, Members <b>101 - 200</b>		Phone No. (Include Area Code) <b>(601) 974-2900</b>
Street Address <b>407 East Pascagoula Street, Jackson, MS 39209</b>		City, State and ZIP Code		
Name <b>RECEIVED</b>		No. Employees, Members		Phone No. (Include Area Code)
Street Address <b>U.S. EEOC/IAO</b>		City, State and ZIP Code		
DISCRIMINATION BASED ON (Check appropriate box(es)) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)				DATE(S) DISCRIMINATION TOOK PLACE Earliest    Latest <b>08-12-2013    10-29-2013</b> <input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <b>My job title as of February 2013 was Patrol Deputy. I also had surgery February 2013 due to a medical condition that was the result of an on the job injury that I sustained July 2012. April 2013, employees had to participate in a weapons qualification. I could not kneel at the time because of my medical condition. Although my supervisor and Captain were aware of my medical condition, I still had to participate. I did not qualify. I was not allowed to take the weapons qualification again. The first week of August 2013, my doctor requested light duty because of my injury. My supervisor, Donald Rhodes and Captain Jeremiah Jones would not grant me the accommodation. I did not need the accommodation the second week of August. However, August 12, I was send home and my patrol vehicle was taken. I was assigned to work downtown (on East Pascagoula Street) and get my own means of transportation. I was written up the first night I was to report because I could not report because I did not have transportation. I was assigned to work the front desk. I sought rides with co-workers but I was not successful. October 29, 2013, I was demoted to Jailer and my wages were reduced by \$10,000.</b>				
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements		
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT		
<b>11/13/14</b> Date  Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)		



Case: 25CH14-cv-00675-TTG Document # 2-1 Filed: 10/29/2014 Page 1 of 1			
<b>COVER SHEET</b> <b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)			
Mississippi Supreme Court Administrative Office of Courts	Form AOC/01 (Revised 1/1/2001)		
This area to be completed by clerk			
Court Identification Docket Number <u>25702</u>			
County # <u>10</u> Judicial Court ID <u>10</u> District (CH, CI, CO) <u>10</u>			
Month <u>10</u> Date <u>29</u> Year <u>14</u>			
Local Docket ID <u>1673</u>			
Case Number if filed prior to 1/1/94 _____			
IN THE <u>CIRCUIT</u> COURT OF <u>HINDS</u> COUNTY			
Short Style of Case: <u>Horton vs. Hinds County</u>			
Party Filing Initial Pleading: Type/Print Name <u>Ware Law Firm, PLLC, Daniel D. Ware</u> MS Bar No. <u>10847</u>			
Check (✓) if Not an Attorney Check (✓) if Pro Hac Vice Signature <u>[Signature]</u>			
Compensatory Damages Sought: \$ <u>25,000.00</u> Punitive Damages Sought: \$ <u>25,000.00</u>			
Is Child Support contemplated as an issue in this suit? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment			
PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM			
Individual <u>Horton</u> Last Name <u>Throssia</u> First Name <u>( )</u> Maiden Name, if Applicable <u>M.</u> Middle Init. <u>Jr/Sr/III/V</u>			
Address of Plaintiff <u>Jackson, Tennessee</u>			
Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: <u>Estate of</u>			
Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: <u>D/B/A / Agency</u>			
Business <u>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated</u>			
Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: <u>D/B/A:</u>			
DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM			
Individual <u>Throssia</u> Last Name <u>Throssia</u> First Name <u>( )</u> Maiden Name, if Applicable <u>M.</u> Middle Init. <u>Jr/Sr/III/V</u>			
Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: <u>Estate of</u>			
Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: <u>D/B/A / Agency Hinds County, Mississippi</u>			
Business <u>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated</u>			
Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: <u>D/B/A:</u>			
ATTORNEY FOR THIS DEFENDANT: _____ Bar No. _____ or Name: _____ Pro Hac Vice (✓) <input checked="" type="checkbox"/>			
(If known)			
In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.			
<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Bankruptcy <input type="checkbox"/> Business Dissolution - Corporation <input type="checkbox"/> Business Dissolution - Partnership <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Examination of Debtor <input type="checkbox"/> Execution <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Pension <input type="checkbox"/> Receivership <input type="checkbox"/> Replevin <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other _____	<b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____ <b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> ERISA <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Extraordinary Writ <input type="checkbox"/> Federal Statutes <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Municipal Annexation <input type="checkbox"/> Racketeering (RICO) <input type="checkbox"/> Railroad <input type="checkbox"/> Seaman <input type="checkbox"/> Other _____ <b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Employment Security Comm'n <input type="checkbox"/> Municipal Court <input type="checkbox"/> Oil & Gas Board <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other _____	<b>Children and Minors - Non-Domestic</b> <input type="checkbox"/> Adoption - Noncontested <input type="checkbox"/> Consent to Abortion for Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ <b>Torts - Personal Injury</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Products Liability <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____ <b>Mass Tort</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Chemical Spill <input type="checkbox"/> Dioxin <input type="checkbox"/> Hand/Arm Vibration <input type="checkbox"/> Hearing Loss <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> Other _____ <b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Receiver Appointment <input type="checkbox"/> Tax Sale: Confirmation/Cancellation <input type="checkbox"/> Title, Boundary &/or Easement <input type="checkbox"/> Other _____ <b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief <input type="checkbox"/> Prisoner <input type="checkbox"/> Other _____	
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Inconceivable Differences <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (formerly URESA) <input type="checkbox"/> Other _____		<b>Contract</b> <input checked="" type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability under Contract <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____	

Case: 25CI1:14-cv-00675-TTG Document #: 3 Filed: 10/31/2014 Page 1 of 1

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

---

**SUMMONS**

---

THE STATE OF MISSISSIPPI

TO: Hinds County, Mississippi  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

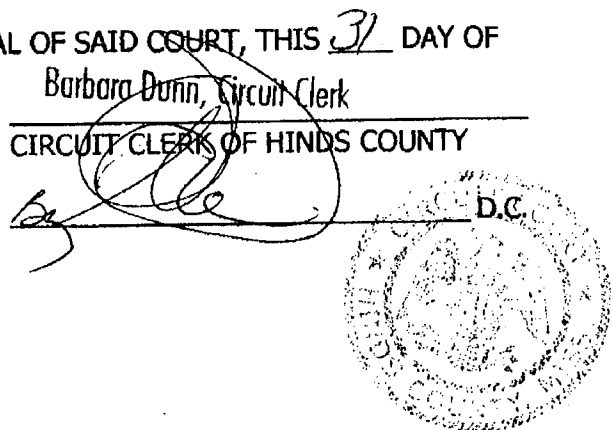
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

You must also file the original of you response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 31 DAY OF  
Oct, 2014.

Barbara Dunn, Circuit Clerk  
CIRCUIT CLERK OF HINDS COUNTY



**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14 675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

---

**SUMMONS**

---

THE STATE OF MISSISSIPPI

TO: Hinds County Sheriff's Department  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 31 DAY OF  
Oct, 2014.

Barbara Dunn, Circuit Clerk  
CIRCUIT CLERK OF HINDS COUNTY

D.C.

Case: 25CI1:14-cv-00675-TTG Document #: 5 Filed: 10/31/2014 Page 1 of 1

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

---

**SUMMONS**

---

THE STATE OF MISSISSIPPI

TO: Hinds County Board of Supervisors  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

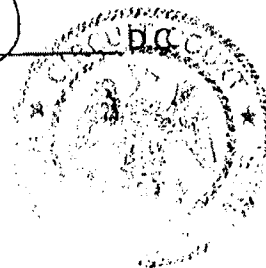
You must also file the original of you response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 31 DAY OF  
Oct, 2014.

Barbara Dunn, Circuit Clerk.

CIRCUIT CLERK OF HINDS COUNTY

B. Dunn



Case: 25CI1:14-cv-00675-TTG Document #: 6 Filed: 11/11/2014 Page 1 of 2

**PROOF OF SERVICE – SUMMONS  
(PROCESS SERVER)**Eddie Carr  
Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above the manner set forth below:

\_\_\_\_ **FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE:** By mailing (by first class mail postage prepaid) on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope postage prepaid, addressed to the sender.

✓ **PERSONAL SERVICE:** I personally delivered copies to E. Carr's Ad. Assist on the 10<sup>th</sup> day of Nov., 2014, where I found said person(s) in Hinds County of the State of Mississippi.

\_\_\_\_ **RESIDENCE SERVICE:** After exercising reasonable diligence I was unable to deliver copies to said person within \_\_\_\_\_ County, Mississippi. I served the summons and complaint on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at the usual place of abode of said person by leaving a true copy of the summons and complaint with \_\_\_\_\_, who is the \_\_\_\_\_, a member of the family of the person(s) served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. I mailed (by first class mail, postage prepaid) copies to the persons served at his or her usual place of abode where the copies were left.

\_\_\_\_ **CERTIFIED MAIL SERVICE:** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

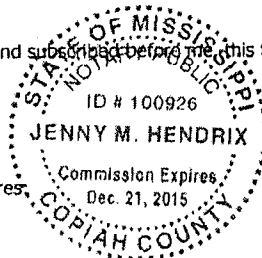
Name: Daniel Dwayne  
Address: 2609 US Hwy 49S 39073  
Telephone No. 601 845 9273  
Fee for service: \$ \_\_\_\_\_

STATE OF MISSISSIPPI  
COUNTY OF Rankin

Personally appeared before me the undersigned authority in and for the State and County aforesaid, the within named Daniel Dwayne, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

[Signature]  
PROCESS SERVER (Signature)

Sworn to and subscribed before me, this the 11<sup>th</sup> day of Nov., 2014.



My Commission Expires

12-21-14

[Signature]  
NOTARY PUBLIC

Case: 25CI1:14-cv-00675-TTG Document #: 6 Filed: 11/11/2014 Page 2 of 2

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

**SUMMONS**

THE STATE OF MISSISSIPPI

TO: Hinds County Board of Supervisors  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

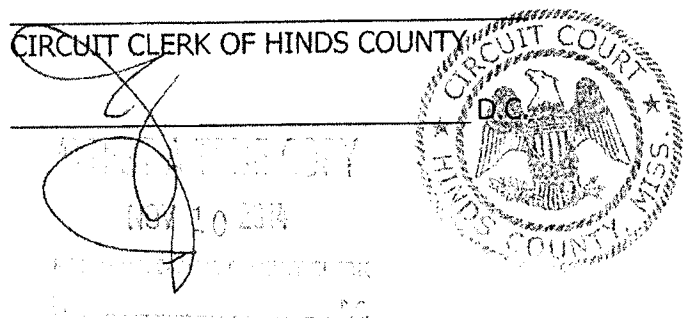
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

You must also file the original of you response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 10 DAY OF  
Nov, 2014.

CIRCUIT CLERK OF HINDS COUNTY



Case: 25CI1:14-cv-00675-TTG Document #: 7 Filed: 11/11/2014 Page 1 of 2

**PROOF OF SERVICE – SUMMONS  
(PROCESS SERVER)**Eddie Carr  
Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above the manner set forth below:

       **FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE:** By mailing (by first class mail postage prepaid) on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope postage prepaid, addressed to the sender.

✓ **PERSONAL SERVICE:** I personally delivered copies to E. Carr's Ad Assist on the 10<sup>th</sup> day of November 14, where I found said person(s) in Hinds County of the State of Mississippi.

       **RESIDENCE SERVICE:** After exercising reasonable diligence I was unable to deliver copies to said person within        County, Mississippi. I served the summons and complaint on the        day of       , 20   at the usual place of abode of said person by leaving a true copy of the summons and complaint with       , who is the       , a member of the family of the person(s) served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the        day of       , 20  . I mailed (by first class mail, postage prepaid) copies to the persons served at his or her usual place of abode where the copies were left.

       **CERTIFIED MAIL SERVICE:** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

Name:

Daniel D Ware

Address:

2409 US Hwy 495 39073

Telephone No.

601 845 9273

Fee for service: \$

STATE OF MISSISSIPPI

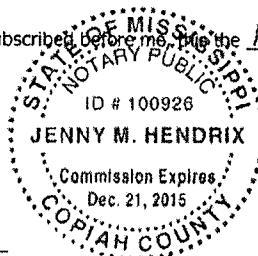
COUNTY OF

Rankin

Personally appeared before me the undersigned authority in and for the State and County aforesaid, the within named Daniel D. Ware, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

[Signature]  
PROCESS SERVER (Signature)

Sworn to and subscribed before me, this the 11<sup>th</sup> day of Nov, 2014.

[Signature]  
NOTARY PUBLIC

My Commission Expires:

12-21-15

Case: 25CI1:14-cv-00675-TTG Document #: 7 Filed: 11/11/2014 Page 2 of 2

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

---

**SUMMONS**

THE STATE OF MISSISSIPPI

TO: Hinds County Sheriff's Department  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

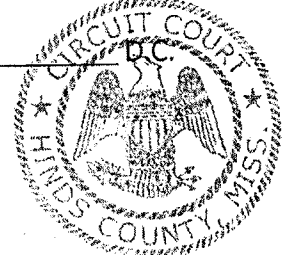
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

You must also file the original of you response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 10 DAY OF  
NOV, 2014.

\_\_\_\_\_  
CIRCUIT CLERK OF HINDS COUNTY



Case: 25CI1:14-cv-00675-TTG Document #: 8 Filed: 11/11/2014 Page 1 of 2

**PROOF OF SERVICE – SUMMONS  
(PROCESS SERVER)**Eddie Carr

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above the manner set forth below:

       **FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE:** By mailing (by first class mail postage prepaid) on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgment and return envelope postage prepaid, addressed to the sender.

☒ **PERSONAL SERVICE:** I personally delivered copies to Eddie Carr Ad. Assis. on the 10<sup>th</sup> day of Nov., 2014, where I found said person(s) in Hinds County of the State of Mississippi.

       **RESIDENCE SERVICE:** After exercising reasonable diligence I was unable to deliver copies to said person within        County, Mississippi. I served the summons and complaint on the        day of       , 20       at the usual place of abode of said person by leaving a true copy of the summons and complaint with        who is the       , a member of the family of the person(s) served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the        day of       , 20      . I mailed (by first class mail, postage prepaid) copies to the persons served at his or her usual place of abode where the copies were left.

       **CERTIFIED MAIL SERVICE:** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served.

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

Name: Daniel D Ware  
 Address: 2609 US Hwy 49S 39073  
 Telephone No. 6018459273  
 Fee for service: \$       

STATE OF MISSISSIPPI  
 COUNTY OF Rankin

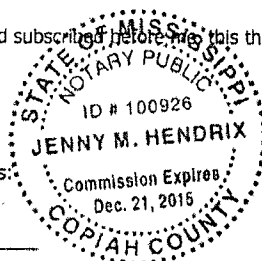
Personally appeared before me the undersigned authority in and for the State and County aforesaid, the within named Daniel D. Ware, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

[Signature]  
 PROCESS SERVER (Signature)

Sworn to and subscribed before me this the 11<sup>th</sup> day of Nov, 2014.

My Commission Expires:

12-21-15



[Signature]  
 NOTARY PUBLIC

Case: 25CI1:14-cv-00675-TTG Document #: 8 Filed: 11/11/2014 Page 2 of 2

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI  
FIRST JUDICIAL DISTRICT**

**THROSSIA HORTON**

**PLAINTIFF**

**VS.**

**CAUSE NUMBER:** 14-675

**HINDS COUNTY, MISSISSIPPI,  
HINDS COUNTY SHERIFF'S DEPARTMENT  
HINDS COUNTY BOARD OF SUPERVISORS and  
JOHN DOES 1 THROUGH 10**

**DEFENDANTS**

**SUMMONS**

THE STATE OF MISSISSIPPI

TO: Hinds County, Mississippi  
Eddie Jean Carr,  
Chancery Clerk and Clerk of the Hinds County Board of Supervisors,  
316 South President Street, Jackson, Mississippi.

**NOTICE TO DEFENDANT**

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND  
YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the  
Complaint to **WARE LAW FIRM, PLLC**, Daniel D. Ware, Attorney for Plaintiff,  
whose mailing address is 2609 US Highway 49 S, Florence, MS 39073. Your  
response must be mailed or delivered within thirty (30) days from the date of  
delivery of this Summons and Complaint or a Judgment by Default will be  
entered against you for the money or things demanded in the Complaint.

You must also file the original of you response with the clerk of this court within  
a reasonable time afterward.

ISSUED UNDER MY HAND AND THE SEAL OF SAID COURT, THIS 10 DAY OF  
Nov, 2014.

RECEIVED  
NOV 10 2014  
CLERK OF HINDS COUNTY  
JACKSON, MISSISSIPPI

CIRCUIT CLERK OF HINDS COUNTY

